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RASIER, LLC; and RASIER-CA, LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC., PASSENGER SEXUAL ASSAULT LITIGATION	Case No. 3:23-md-03084-CRB
This Document Relates to:	**DECLARATION OF BRETT D. HARRISON AND FTI CONSULTING, INC.**
ALL ACTIONS	

1   **DECLARATION OF BRETT D. HARRISON AND FTI CONSULTING, INC.**

2   I Brett D. Harrison, am a Senior Managing Director within FTI Consulting, Inc.'s ("FTI")

3   Technology Segment. I currently lead FTI's Digital Forensics Practice. I have over thirty years of

4   experience assisting clients with Digital Forensic and Electronic Discovery (e-Discovery) related

5   engagements. Since joining FTI, I have led many dozens of engagements involving the investigation

6   of Intellectual Property (IP) theft, forensic data collection and the processing and analysis of data.

7   Prior to my employment with FTI, I was employed by the Federal Bureau of Investigation

8   (FBI) for fifteen years. For seven of those years (from 1999 until 2006), I worked within the FBI's

9   Computer Analysis Response Team (CART) Unit in Washington, D.C. The FBI's CART Unit is

10   responsible for the forensic acquisition and processing of all computers which are examined by the

11   FBI. During my tenure with the CART Unit, I worked as both an FBI Certified Forensic Examiner of

12   computer evidence and as a Program Manager. As a Computer Forensic Examiner, I conducted

13   acquisitions and forensic examinations of a wide range of computers including laptops, desktops and

14   servers as well as computers which utilized both Windows and UNIX operating systems.

15   Following my certification as a Forensic Examiner, I also served as a Program Manager within

16   the CART Unit and was responsible for ensuring that the FBI's 400 Forensic Examiners of computer

17   evidence had the necessary knowledge, skills and tools required to perform forensic examinations. As

18   a Program Manager, I focused on leading the development of custom and semi-custom forensic tools

19   to allow the FBI's Forensic Examiners to accurately collect, preserve, and process data from computer

20   systems.

21   During the course of my career, I have conducted many hundreds of forensic analyses and have

22   authored hundreds of forensic reports. I have testified in court twenty times in both civil and criminal

23   matters. I have provided numerous written declarations and reports, and have been deposed several

24   times. I have worked on both the plaintiff and defendant sides of many engagements and have even

25   served   in   a   "neutral"   capacity   on   numerous   occasions.

26   FTI is a well-respected, independent, global business advisory firm dedicated to helping

27   organizations manage change, mitigate risk, and resolve disputes: financial, legal, operational,

28   political & regulatory, reputational, and transactional. The organization has more than 8,000

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DECLARATION OF BRETT D. HARRISON AND FTI CONSULTING, INC.

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1 consultants and professionals in approximately 27 countries, and every year, FTI helps many

2 thousands of organizations globally transform the way they anticipate and respond to events. The

3 scope of FTI's clients includes, but is not limited to, many of Fortune's Global 100 corporations. I

4 am supported by hundreds of dedicated digital forensics, cybersecurity, incident response, and data

5 and analytics consultants, with cross-functional teams led by those with decades of experience at the

6 highest levels of law enforcement, intelligence, and global private sector institutions

7   FTI is being compensated for work in this matter at its current standard hourly rates charged

8 for each person working on the project. FTI's rates range from $225/hour to $895/hour—depending

9 on the practitioner. Generally, simple forensic work is performed by lower bill rate practitioners, and

10 more complex expert reporting and testimony work is performed by more senior practitioners. My

11 current rate is $895/hour. No part of my or FTI's compensation is dependent on the contents of this

12 Declaration, the substance of any further opinions I may offer, or the ultimate outcome of this matter.

13   I have been asked to compare and analyze 2 ride receipts which were produced by Plaintiff's

14 counsel in MDL No. 3084 and which purport to show evidence of Uber ride activity by that Plaintiff.

15   I visually scrutinized the receipts to look for discrepancies. I reviewed and compared the

16 population of actual receipts produced from Uber as part of the Defendant Fact Sheet ("DFS") process.

17 Appendix A contains the bates numbers of the files that I reviewed for purposes of my analysis.

18   During my review, I relied upon other members of the FTI Technology practice working under

19 my direction. Any reference to "I," "my" or "FTI" include my efforts as well as those working under
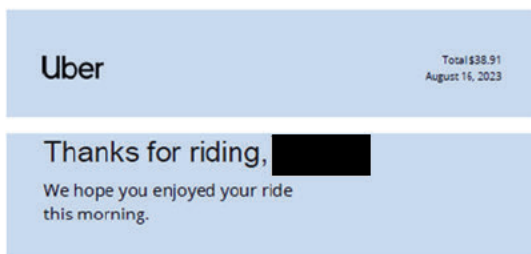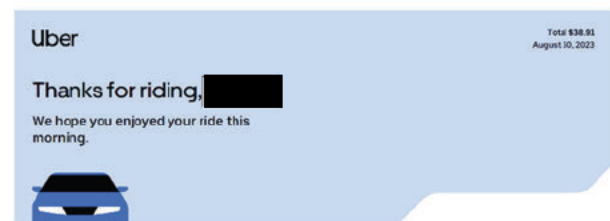
20 my supervision.

21   I understand, based on my knowledge, experience and research, that reviewing PDF metadata

22 can provide insight into a PDF file's origin, history, and authenticity. I reviewed file metadata to show

23 what particular software was used to create and produce the Plaintiff-submitted PDF receipts.

24   I reviewed 2 receipts which purport to be from an Uber ride that occurred on August 16, 2023.

25 My review determined that there was evidence in both receipts of changes and edits. My conclusions

26 about the 2 receipts are based on evidence that includes discrepancies in content and formatting

27 including characters, trip date, payment timestamps and embedded hyperlinks.

28   Below are the details of my analysis:

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1 **3666_160574.pdf**

2   I reviewed the content of the file named "3666_160574.pdf" to determine whether there was

3 an indication that the receipt file content was fabricated, changed or edited. I understand that Plaintiff

4 produced this file during the course of this litigation. Additionally, I reviewed and compared this file

5 to other receipts produced from Uber as part of the DFS process. I noted that "3666_160574.pdf"

6 appeared to be a modified version of an original receipt from Uber's system ("3666 - Real

7 Receipt.pdf") based on it matching the exact dollar-cents amount for Total, dollar-cents for Trip fare,

8 pickup time, pickup address, drop-off time and drop-off address. The alteration to "3666_160574.pdf."

9 appeared to include having edited the date to display "August 16, 2023" instead of "August 30, 2023."

10 The record from the original email receipt from Uber's system ("3666_Real Receipt_Email

11 Version.pdf") showed a payment timestamp of 8/30/23 12:38 PM. Additionally, after inspecting the

12 embedded hyperlink button for "Download PDF" contained in "3666_160574.pdf " and subsequently

13 visiting that embedded URL using my web browser, I determined that the embedded URL directed

14 me to the Download PDF page for an Uber trip with a Trip uuID "███████████████████

15 ████████." This Trip uuID appears to also be associated with a real trip that occurred on August

16 30, 2023 (*see* "3666_Real Receipt_Email Version.pdf"). I also noted as part of my analysis that the

17 embedded metadata in "3666_160574.pdf " showed that the PDF file was created on 10/23/2025 by

18 "Author: ███████" with "Acrobat PPFMaker 25 for Word" and produced by "Adobe PDF

19 Library 25.1.20" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt".

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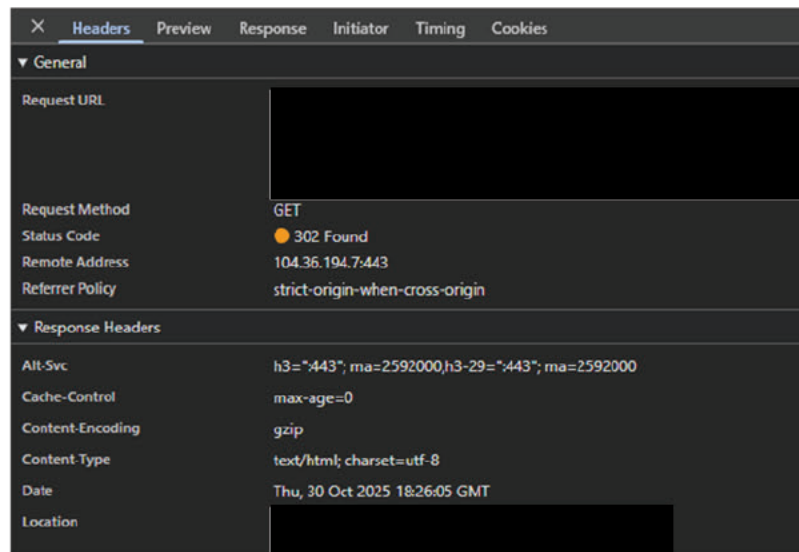26   **3666_160574.pdf**   **3666_Real Receipt_Email Version.pdf**

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3666_160574.pdf

3666_Real Receipt_Email Version.pdf

Uber web server response to requested embedded "Download PDF" URL contained in 3666_160574.pdf

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DECLARATION OF BRETT D. HARRISON AND FTI CONSULTING, INC.

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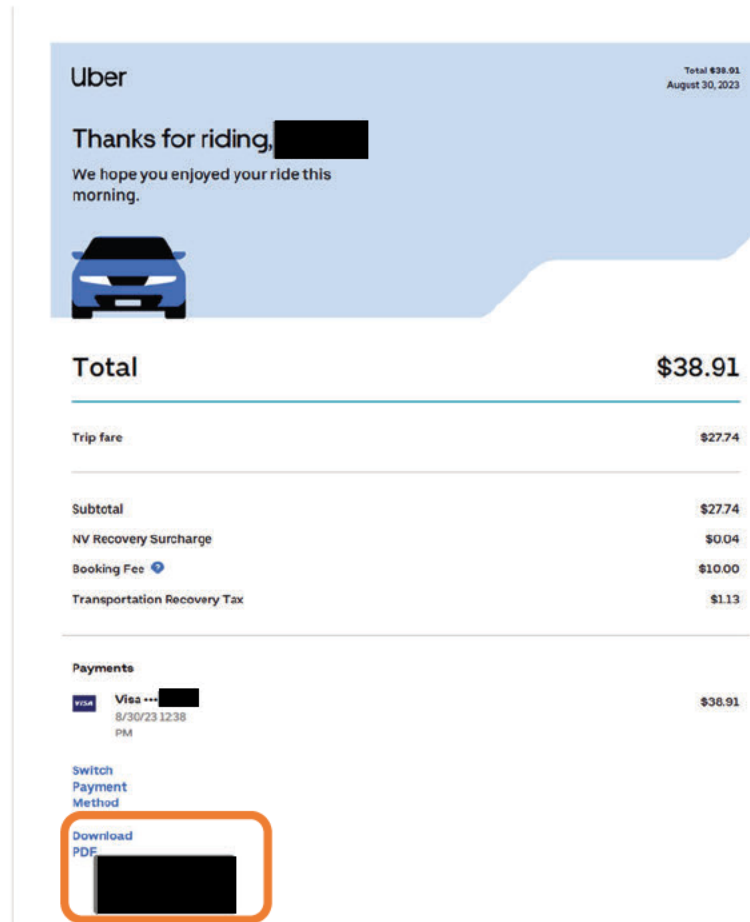
3666_Real Receipt_Email Version.pdf

3666_123472.pdf

I re-reviewed the content of the file named "3666_123472.pdf" to determine whether there was an indication that the receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. Additionally, I reviewed receipts produced from Uber as part of the DFS process. I noted that "3666_123472.pdf" appeared to be a modified version of an original receipt from Uber's system ("3666 - Real Receipt.pdf") based on matching the exact dollar-cents amount for Total, dollar-cents for Trip fare, pickup time, pickup address, drop-off time and drop-off address. The alteration appeared to have edited the date, so that it showed "August 16, 2023". I observed an inconsistent white line between the total and the date. I observed an inconsistent dollar sign ($) character being used. I observed inconsistent black lines under the number 8, the dot character, and the number 9. I noted that the embedded metadata indicated the file was created by "Adobe Acrobat Pro (64-bit) 24.5.20421" and produced by "Adobe Acrobat Pro (64-bit) 24.5.20421" and not Uber's PDF receipt creator "wkhtmltopdf" and producer "Qt". My findings remain the same.

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Total **$38.91**
August 16, 2023

Total **$38.91**
August 30, 2023

3666_123472.pdf

3666 - Real Receipt.pdf

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 03/11/2025 .

Brett D. Harrison
Senior Managing Director
FTI Consulting Technology

Brett D. Harrison

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DECLARATION OF BRETT D. HARRISON AND FTI CONSULTING, INC.

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Attachment 1
Documents Considered

List of Documents Considered

UBER-MDL3084-DFS00001272	1318_40_█████████ - req 6a_1.pdf
UBER-MDL3084-DFS00001697	1011_40_Jane Roe CL 3 ████████ - req 6a_1.pdf
UBER-MDL3084-DFS00006581	1086_40_█████████ - req 6a_1.pdf
UBER-MDL3084-DFS00007746	1101_40_████████ - req 6a_1.pdf
UBER-MDL3084-DFS00007750	1101_40_████████ - req 6a_2.pdf
UBER-MDL3084-DFS00009723	1119_40_Jane Doe LS 348 ████████ - req 6a_1.pdf
UBER-MDL3084-DFS00009977	1124_40_Jane Doe LS 259 ███████ - req 6a_1.pdf
UBER-MDL3084-DFS00009979	1124_40_Jane Doe LS 259 ███████ - req 6a_2.pdf
UBER-MDL3084-DFS00010299	1126_40_Jane Doe LS 260 ██████████ - req 6a_1.pdf
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UBER-MDL3084-DFS00010529	1131_40_Jane Doe LS 293 ███████ █████ - req 6a_2.pdf
UBER-MDL3084-DFS00010780	1138_40_Jane Doe LS 149 ███████ - req 6a_1.pdf
UBER-MDL3084-DFS00010859	1140_40_Jane Doe LS 155 █████████ - req 6a_1.pdf
UBER-MDL3084-DFS00011479	1153_40_Jane Doe LS 253 ██████ - req 6a_1.pdf
UBER-MDL3084-DFS00011608	1157_40_Jane Doe LS 112 █████████ - req 6a_1.pdf

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MDLC DOC ID 123472	Ride Receipt

MDLC DOC ID 160574	First Amended Ride Receipt - Emailed Receipt from Uber, her friend ordered the ride. See PFS.
N/A	3666_Real Receipt_Email Version.pdf
N/A	3666 - Real Receipt.pdf

Attachment 2
List of Publications and Prior Testimony

Brett D. Harrison

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Publications

2021 – Co-authored an article related to new methods for analyzing mobile devices to determine whether they have been infected and/or hacked.

2021 – Co-authored an article on "Discovery in the Cloud." The article focused on taking a close look at the risks and challenges, specifically with respect to Dropbox.

2015 – Co-authored an article on Information Management.com titled "Forensic Files: Lessons from Real Cases" which dealt with collecting data from social media sites and mobile, BYOD devices.

Testimony, Reporting, Deposition and Declaration

11/10/2023 Nashville US District Court; Ecolab Inc. v. Anthony Ridley and Chemtreat, Inc. Retained by the Special Master and submitted an Expert Report related to activities observed on a number of computers.

6/29/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted a Second Supplemental Expert Rebuttal Report in Support of Archer Aviation

4/26/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted a Declaration in Support of Archer's Opposition to Wisk's Motion for Adverse Inferences

4/21/2023 Applied Predictive Technologies, Inc. v. Marketdial, Inc. et al. Provided Deposition testimony related to a number of Intellectual Property Theft related topics outlined in Expert Rebuttal Report dated 2/8/2023.

4/4/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted a Supplemental Expert Rebuttal Report in Support of Archer Aviation

2/15/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted a Sur-Reply Declaration in Support of Archer Opposition to Wisk's Spoliation Motion

2/8/2023 Applied Predictive Technologies, Inc. v. Marketdial, Inc. et al. Submitted an Expert Report related to the exfiltration and use of certain electronic Intellectual Property materials.

2/7/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation Provided Deposition testimony related to a number of Intellectual Property Theft related topics outlined in Expert Rebuttal Report dated 1/27/2023.

1/27/2023 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted an Expert Rebuttal Report related to multiple topics surrounding potential misappropriation of electronic documents.

5/2/2022 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted a Declaration in support of certain Third Parties in opposition to a Wisk Aero LLC Motion to Compel Forensic Inspections.

2/11/2022 New York US District Court; George Galgano v. County of Putnam, New York, et al. Submitted an Affidavit which outlined FTI's process for organizing and threading TXT messages exported off mobile devices.

7/1/2021 San Francisco US District Court; Wisk Aero v. Archer Aviation Provided Deposition testimony to support a Declaration which documented the investigation and analysis of Archer's systems to attempt to locate any Wisk Aero Intellectual Property. Testimony covered multiple FTI workstreams to include Digital Forensics and also Brainspace analysis of Archer data.

6/24/2021 San Francisco US District Court; Wisk Aero v. Archer Aviation Submitted a Declaration to document FTI's investigation and analysis of Archer's systems to attempt to locate any Wisk Aero Intellectual Property. The Declaration covered multiple FTI workstreams to include Digital Forensics and also Brainspace analysis of Archer data.

Declaration of Brett D. Harrison and FTI Consulting, Inc.

Final Audit Report   2025-11-03

Created:	2025-11-03
By:	Deborah Hillburn (dhillburn@shb.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA4zEa2dXzs6YpUoheDS8hNBQgTCUYDjmX

"Declaration of Brett D. Harrison and FTI Consulting, Inc." History

📄 Document created by Deborah Hillburn (dhillburn@shb.com)
2025-11-03 - 4:52:52 PM GMT

✉ Document emailed to Brett Harrison (brett.harrison@fticonsulting.com) for signature
2025-11-03 - 4:52:59 PM GMT

📄 Email viewed by Brett Harrison (brett.harrison@fticonsulting.com)
2025-11-03 - 4:56:42 PM GMT

✍ Document e-signed by Brett Harrison (brett.harrison@fticonsulting.com)
Signature Date: 2025-11-03 - 6:36:47 PM GMT - Time Source: server

✅ Agreement completed.
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